

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-9-E**

IN RE: South Carolina Electric & Gas Company's)
Integrated Resource Plan (IRP))
)
)
)
)

**PETITION
TO
INTERVENE**

INTRODUCTION

A filing was made in Commission Docket 2016-9-E, on February 26, 2016, by South Carolina Electric & Gas Company ("SCE&G"). Petitioner herein is SC Solar Development, LLC. This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Petition to Intervene follows:

PETITIONER

SC Solar Development, LLC.

1. SC Solar Development, LLC, ("SC Solar Development") is a South Carolina Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina, with its registered agent located in Greenville, South Carolina. SC Solar Development, LLC is a wholly owned subsidiary of National Renewable Energy Corporation ("NARENCO").

2. SC Solar Development, as a wholly owned subsidiary, operates under the business model of NARENCO. NARENCO is a vertically integrated Solar Company with in house design, engineering, procurement, construction developer, financier, and Operations and Maintenance provider. NARENCO, through its subsidiaries, including SC Solar Development, controls a pipeline of approximately 500 MW in South Carolina, has built nearly 100 MW of solar to this date, and has approximately 800 MW pipeline across the southeast.

Request for Intervenor Status.

3. Petitioner, SC Solar Development has previously received approval for intervention from this Commission, in Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket No. 2016-2-E and Docket No. 2016-1-E.

4. SC Solar Development is financially impacted by SCE&G's filing, as is outlined in more detail hereinbelow.

5. Specifically, Petitioner plans to conduct, business in SCE&G's assigned territory, including sales to SCE&G's Consumers and Petitioner SC Solar Development has a material interest in SCE&G's filing.

SCE&G'S Filing.

6. SCE&G's filing was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended) and Commission Order No. 1998-502. SCE&G's filing is SCE&G's annual update to its Integrated Resource Plan, ("IRP").

7. SCE&G's annual IRP filing outlines potential infrastructure which will be needed to match SCE&G's forecasted electricity requirements. SCE&G's IRP filing should contain a demand and energy forecast and the utility's acceptable plan for meeting SCE&G's forecast requirements.

8. As outlined hereinabove, Petitioner, SC Solar Development has substantial business interests in SCE&G's assigned territory in South Carolina.

9. Petitioner's position is that SC Solar Development has a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's review of SCE&G's filing in South Carolina. Petitioner's further position is that Petitioner SC Solar Development will be impacted by SCE&G's IRP planning, which necessarily influences SCE&G's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of SCE&G's IRP are important to the Petitioner from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in SCE&G's filing, and this Commission's review and Petitioner's interests are not adequately represented by the current parties in this Docket.

10. Petitioner's interests cannot be adequately addressed by any other party who has or may, intervene in this matter. Further, no other party has been given authority to legally bind or to act on Petitioner's behalf.

11. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-96. This Petition to Intervene is timely filed with this Commission.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

PETITION TO INTERVENE

14. The granting of SC Solar Development's Petition to Intervene is (i) in the public interest (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed and (iii) contemplated in this Commission's Order 2012-96.

15. SC Solar Development, LLC is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

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Counsel for Petitioner, SC Solar Development, LLC

April 13, 2016

Columbia, South Carolina